

AO 106 (Rev. 04/10) Application for a Search Warrant (Modified: WAWD 10-26-18)

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
*(Briefly describe the property to be searched  
 or identify the person by name and address)*  
 Subject Premises located at:  
 15219 NE 90th Street, Redmond, WA 98052,  
 as further described in Attachment A

Case No. MJ20-532

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A

located in the Western District of Washington, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

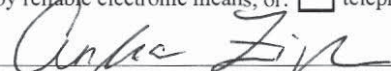
<i>Code Section</i>	<i>Offense Description</i>
21U.S.C. § 331	Introduction of Misbranded Drugs Into Interstate Commerce

The application is based on these facts:

☒ See Affidavit of Special Agent Angela Zigler continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or: ☐ telephonically recorded.

  
 Applicant's signature

Angela Zigler, Special Agent, FDA-OCI  
 Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 08/19/2020

  
 Judge's signature

City and state: Seattle, Washington

Mary Alice Theiler, United States Magistrate Judge  
 Printed name and title

**AFFIDAVIT**

STATE OF WASHINGTON ) ss  
COUNTY OF KING )

**INTRODUCTION AND AGENT BACKGROUND**

I, ANGELA ZIGLER, being first duly sworn on oath, depose and say:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the Food and Drug Administration (FDA), Office of Criminal Investigations (OCI) and have been so employed since November 2012. As such, I am responsible for investigating criminal violations of the Federal Food, Drug, and Cosmetic Act (FDCA), 21 U.S.C. §§ 301 et seq.; the Controlled Substances Act, 21 U.S.C. §§ 801 et seq.; the Public Health Service Act, 42 U.S.C. §§ 201 et seq.; and related violations within Title 18 of the United States Code. Prior to my employment with FDA-OCI, I was a Special Agent with the U.S. Department of Treasury, Treasury Inspector General for Tax Administration. My professional and academic training includes intensive training at the Federal Law Enforcement Training Centers in Glynco, GA and Charleston, SC. Additionally, I have completed the Basic Investigative Electronics Training Program and the Pharmaceutical Fraud Training Program. During my law enforcement career, I have conducted and participated in federal criminal investigations involving but not limited to pharmaceutical fraud, financial fraud, extortion, conflict of interest violations, obstruction of tax administration, and unauthorized access to government computers. I have participated in the execution of search warrants on businesses and residences in connection with suspected mail fraud, wire fraud, and the introduction of misbranded and/or adulterated drugs, devices, and/or food. I have also participated in executing arrest warrants in pharmaceutical fraud investigations.

**PURPOSE OF AFFIDAVIT**

2. I make this affidavit in support of an application under Rule 41 of the Federal Rules of Criminal Procedure for a warrant to search the premises located at

1 15219 NE 90<sup>th</sup> Street, Redmond, WA 98052 (hereinafter "SUBJECT PREMISES"), as  
2 more fully described in Attachment A to this Affidavit, for the property and items  
3 described in Attachment B to this Affidavit, as well as any digital devices or other  
4 electronic storage media located therein.

5 3. Based on my training and experience and the facts as set forth in this  
6 Affidavit, there is probable cause to believe that the SUBJECT PREMISES contains  
7 evidence, fruits and instrumentalities of violations of Title 21, United States Code,  
8 Section 331(a) (Introduction of a Misbranded Drug into Interstate Commerce).

9 4. The facts set forth in this Affidavit are based on my own personal  
10 knowledge, knowledge obtained from other individuals during my participation in this  
11 investigation, including other law enforcement officers, review of documents and records  
12 related to this investigation, communications with others who have personal knowledge  
13 of the events and circumstances described herein, and information gained through my  
14 training and experience. Because this Affidavit is submitted for the limited purpose of  
15 establishing probable cause in support of the application for a search warrant, it does not  
16 set forth each and every fact that I or others have learned during the course of this  
17 investigation.

### 18 **BACKGROUND**

19 5. The FDA is charged with protecting the health and safety of the American  
20 public by enforcing the FDCA, including 21 U.S.C. § 331. One purpose of the FDCA is  
21 to ensure that drugs sold for use by humans were safe, effective, and bore labeling  
22 containing only true and accurate information.

23 6. Under the FDCA, the "intended use" of an article means the objective  
24 intent of the persons legally responsible for the labeling of that article. The intent is  
25 determined by such persons' expressions or can be shown by the circumstances  
26 surrounding the distribution of the article. This objective intent might, for example, be  
27 shown by labeling claims, advertising matter, or oral or written statements by such  
28 persons or their representatives. It might be shown by the circumstances that the article

1 is, with the knowledge of such persons or their representatives, offered and used for a  
2 purpose for which it was neither labeled nor advertised. 21 C.F.R § 201.128.

3 7. Under the FDCA, “label” means “a display of written, printed, or graphic  
4 matter upon the immediate container of any article.” 21 U.S.C. § 321(k). The FDCA’s  
5 requirement that any word, statement, or other information appear on the label is satisfied  
6 only if the word, statement, or other information also appears on the outside container or  
7 wrapper, if such exists, of the retail package of such article, or is easily legible through  
8 the outside container or wrapper. Id. “Labeling” is more broadly defined as all labels  
9 and other printed or graphic matter upon any article or any of its containers or wrappers,  
10 or accompanying such article. 21 U.S.C. § 321(m).

11 8. Under the FDCA, “drugs” are defined as, among other things, articles  
12 intended for use in the cure, mitigation, treatment or prevention of disease in man (21  
13 U.S.C. § 321(g)(a)(B)); articles (other than food) intended to affect the structure or  
14 function of the body of man (21 U.S.C. § 321(g)(1)(C)); or articles intended for use as  
15 components of other drugs (21 U.S.C. § 321(g)(1)(D)).

16 9. A “new drug” is any drug which is not generally recognized, among experts  
17 qualified by scientific training and experience to evaluate the safety and effectiveness of  
18 drugs, as safe and effective for use under the conditions prescribed, recommended, or  
19 suggested in the labeling thereof. 21 U.S.C. § 321(p)(1). In order to be lawfully  
20 introduced or delivered into interstate commerce, a new drug had to be the subject of a  
21 New Drug Application which has been approved by the FDA. 21 U.S.C § 355.

22 10. Pursuant to 21 U.S.C. §353(b)(1), a “prescription drug” is any drug  
23 intended for use by man which:

- 24 a. because of its toxicity or other potentiality for harmful effect, or the method of  
25 its use, or the collateral measures necessary to its use, is not safe for use except  
26 under the supervision of a practitioner licensed by law to administer such drug;  
27 or  
28

b. is limited by an approved new drug application to use under the professional supervision of a practitioner licensed by law to administer such drug.

11. Owners and operators of any establishment in any State where drugs are manufactured must register each such establishment with FDA. 21 U.S.C. § 360(b) & (c). Likewise, foreign establishments must be similarly registered with FDA before they import drugs from such establishments into the United States. 21 U.S.C. § 360(i). “Manufacturing” includes, among other things, not just processing of raw materials into finished drug products, but also repackaging or otherwise changing the container, wrapping or labeling of any drug package to further the distribution of the drug from the original manufacturer to the ultimate consumer. 21 U.S.C. §360(a)(1); 21 C.F.R. § 207.3(a)(8).

12. A drug can be misbranded in several ways. For example, a drug is misbranded if:

- a. its labeling is false or misleading in any particular (21 U.S.C. § 352(a));
- b. it is in package form, unless it bears a label containing the name and place of business of the manufacturer, packer, or distributor (21 U.S.C. § 352(b));
- or
- c. its manufactured, prepared, propagated, compounded, or processed in an establishment not registered with the FDA under 21 U.S.C. § 360, or it was not included in a list required by 21 U.S.C. §360(j) (21 U.S.C. § 352(o)).

13. A drug is also misbranded if the labeling of the drug does not bear adequate directions for use (21 U.S.C. § 352(f)(1)). “Adequate directions for use” means directions under which the layman can use a drug safely and for the purposes for which it is intended (21 C.F.R. § 201.5). Directions under which the layperson can use a prescription drug safely cannot be written because such drugs can only be used safely, if at all, at the direction, and under the supervision, of a licensed medical practitioner. There are some exemptions from this general requirement for approved prescription



1 drugs with their approved labeling, but no such exemptions exist for a drug lacking an  
2 FDA approval.

3 14. In addition, the dispensing of any prescription drug without a valid  
4 prescription written by a licensed medical practitioner is an act which results in the drug  
5 being misbranded while held for sale. 21 U.S.C. § 353(b)(1).

### 6 **FACTS SUPPORTING PROBABLE CAUSE**

7 15. According to the Center for Disease Control and Prevention the severe  
8 acute respiratory syndrome coronavirus 2 (SARS-CoV-2) produces a respiratory disease,  
9 COVID-19. COVID-19 is capable of being spread from person to person. COVID-19  
10 can cause mild symptoms (even no symptoms) to severe illness and it has a wide range of  
11 associated symptoms such as fever, cough, shortness of breath or difficulty breathing,  
12 chills, muscle pain, headache, sore throat and new loss of taste or smell. These  
13 symptoms may appear two to fourteen days after exposure to the virus. There is currently  
14 no vaccine to prevent COVID-19.

#### 15 **A. Background of John T. Stine and North Coast Biologics**

16 16. On March 12, 2020, the FDA-OCI initiated an investigation into John T.  
17 Stine (also known as Johnny Stine), of Redmond, Washington, after receiving a  
18 complaint that Stine posted to LinkedIn that he had manufactured a Coronavirus Disease  
19 2019 (COVID-19) vaccine, and was offering to supply and administer the vaccine to  
20 those who contacted him in Washington state and in other states.

21 17. A review of Johnny Stine's LinkedIn page stated that he was the Founder  
22 & President of North Coast Biologics, Seattle, WA from September 2008 to present. The  
23 "About" section listed "NCB:-Personalized biotech/biotech without borders: Creating and  
24 administering personalized autologous tumor vaccines for cancer patients who request  
25 this service. No patient is turned away regardless of tumor's frequency or market size."

26 18. During the investigation, I searched the Washington State Department of  
27 Health Provider Credential database at

28 <https://fortress.wa.gov/doh/providercredentialsearch/Search> for the name John Stine. A

1 search of the name provided the result “John Patrick Stine” as a “Counselor Agency  
2 Affiliated Registration.” This license was deemed “surrendered” and expired as of  
3 August 22, 2016. John Patrick Stine is not believed to be Johnny T. Stine.

4 19. I searched the Washington Corporations and Charities Filing System  
5 database at <https://ccfs.sos.wa.gov/#/> for the business name North Coast Biologics. A  
6 search of the business name provided the result “North Coast Biologics, LLC” in Seattle,  
7 WA. This business was registered to Johnny Stine on September 30, 2011. This business  
8 was administratively dissolved on January 3, 2012.

9 20. I searched the Washington State Department of Revenue business records  
10 database at [https://secure.dor.wa.gov/gteunauth/\\_/#1](https://secure.dor.wa.gov/gteunauth/_/#1) for the business name North Coast  
11 Biologics. A search of the business name provided the result “North Coast Biologics,  
12 LLC” located in Seattle, WA and governed by Johnny Stine. As of April 30, 2020, this  
13 business was listed as “Active.”

14 21. A search of FDA Center for Biologics Evaluation and Research (CBER),  
15 Electronic Document Room database and the FDA Center for Drug Evaluation and  
16 Research’s (CDER) Document Archiving, Reporting, and Regulatory Tracking System  
17 did not return any submissions and/or applications from Stine and/or North Coast  
18 Biologics.

19 **B. Relevant Facebook Pages**

20 22. I reviewed “Johnny T Stine” Facebook Page, which included the  
21 following four-paragraph Facebook post, dated March 2, 2020:

- 22 a. I can no longer stay silent. No government or corporation is ever going to  
23 protect us. We are the one’s who have to look out for each other. I have  
24 already crossed some major lines creating personalized tumor vaccines for  
25 people who wish to actually fight for their life with legitimate tools,  
26 knowledge, and skills that I’ve acquired over the years. I did this with a  
27 GREAT deal of apprehension because I was afraid to do this. Because it  
28 took me longer than it should have to break through the conventional

“wisdom” forced on me by my industry, I personally feel that some of the earliest people who asked for my help died because I failed to garner enough courage to make this leap. After ~127 cancer patients and more waiting, I’m obviously no longer afraid.

- b. I’ve been making immunogens to raise immune response since 1987 and I’ve pursued anti-viral antibodies at various points in my career (CMV, Flu, KSHV, RSV, HIV). So to make this post short and sweet..... I’ve mentioned that I made a vaccine to nCoV-’19 to the Spike protein and the receptor binding domain of this protein. I made a small amount for testing. After one shot (~25 ugs) and two weeks I was titer-positive to the vaccine. I contain blocking antibodies to the Spike protein RBD (receptor binding domain) which indicates these would be neutralizing in vitro. After the primary immunization (without boosts), I sent my sera to a friend who is partnered with a group in China that can do functional assays-and guess what-my sera contains antibodies that are functionally inhibitory. No big surprise there but the groovy thing is that I sent my sera over there without even a boost. I have boosted myself to see how that raises the titer (I’ll check it in a couple of weeks). So I’m immune to nCoV-2019.
- c. I’m offering my vaccine to people who simply feel that they need it because of increased risk or simply because it would make them comfortable. I’m not sure how much of the reports are hype or not, but the deaths are real and thus I can no longer sit on the sidelines. I’m not able to save the world much less a small town, but I can begin by taking orders for vaccinations. I can begin with 100 people because I’m limited on how much protein I can generate (the costly part). If interested parties pay \$400/person, I can order up enough protein to be made to give each person a primary vaccination with two boosts (this is like the HepB vaccination protocol). The first 100 will be determined by the time stamp on payment (message me here or by



1 text 206-605-0100). If there is greater interest, I will need to outsource the  
 2 protein expression. I will administer the vaccine here in the Seattle area or  
 3 I'll come to you.

4 d. If I make money from this, it will go toward funding the tumor vaccine  
 5 protocols of the 85% of the cancer patients that I see who are already  
 6 \$500K-\$750K in debt and homeless after standard of care by the time they  
 7 find me (I've been treating them for free). I turn no one away regardless of  
 8 stage/progression-why would I deny anyone a right to fight for their life  
 9 with tools that can legitimately make a difference?

10 23. I reviewed the North Coast Biologics (NCB) Facebook Page  
 11 (<http://www.facebook.com/NCBio/>), which listed "Founder & President Johnny Stine"  
 12 and included the following Facebook post, dated March 11, 2020: "NCB's COVID19  
 13 spike protein vaccine is being made available to those who are either at risk or for anyone  
 14 who simply needs some reassurance. Two shots get you a titer that binds the spike  
 15 protein and the receptor binding domain. Message us here to create a spot in the queue.  
 16 This isn't large scale industrial by any means....but locally, very effective."

17 **C. Initial Undercover Contact with Stine**

18 24. On March 12, 2020, I (acting in an undercover capacity as Angela) texted  
 19 telephone number 206-605-0100 (SUBJECT PHONE NUMBER). This is the same  
 20 telephone number listed on the Facebook post dated March 2, 2020. I sent the following  
 21 text message to the SUBJECT PHONE NUMBER: "Hi I saw your post about the  
 22 coronavirus vaccine. I am SO glad someone is doing something about this! I'm really  
 23 interested in getting this for myself and for my mom who is in California. I'm more  
 24 worried about her cause she is older and has a compromised immune system. Please let  
 25 me know if you have any left. Thank you so much! Angela."

26 25. On March 12, 2020, I engaged in a text exchange regarding the  
 27 coronavirus vaccine and received the following text messages from the SUBJECT  
 28 PHONE NUMBER: "It's easy. I generally do the first one. It's a two shot series and

1 we'll add something topically to assist in that immune response. It's a very easy and  
2 groovy approach."

3 **D. March 2020: discussions with Stine's associates**

4 26. On March 27, 2020, I received a complaint that was filed with the FDA  
5 by Individual-1, which stated that Individual-1's friend in Seattle, WA, was injected with  
6 a vaccine for COVID-19 by Stine.

7 27. On March 28, 2020, I spoke with Individual-1 who stated that his/her  
8 friend, Individual-2, received an injection from "Johnny T. Stine" that was reported to be  
9 a vaccine for COVID-19. Individual-1 emailed me text messages between Individual-1  
10 and Individual-2, which included a photograph of Individual-2 being injected in the arm  
11 by Stine dated March 18, 2020, and indicated that Individual-2 paid Stine for the vaccine  
12 injection. Additionally, Individual-1 emailed me correspondence between he/she and the  
13 Subject Facebook Account via Facebook Messenger, in which the Subject Facebook  
14 Account stated, "I was just in Tucson vaccinating a family there. I'll be back there for  
15 their booster shots in four weeks." Individual-1 also provided contact information for a  
16 mutual friend, Individual-3, who spoke with Individual-2 about the reported vaccine.

17 28. On March 30, 2020, I spoke with Individual-3 who emailed me  
18 correspondence between Individual-3 and Individual-2 via Facebook Messenger. The  
19 messages stated that Individual-2 was vaccinated for "Covid19" by his/her "mad scientist  
20 friend," named "Johnny Stine." Individual-2 indicated that Stine "does personalized  
21 medicine" and that "typically he takes your cancer tumor and figures out a way to kill it.  
22 That's what he does for a living." Individual-3 asked Individual-2 if Stine was "licensed  
23 with the State to be doing vaccinations" and Individual 2 replied, "No idea."

24 **E. Undercover Contact #2**

25 29. On April 6, 2020, HSI SSA Dkane (in an undercover capacity acting as a  
26 different individual than in previous contacts) contacted Stine via Facebook Messenger.  
27 The undercover indicated that she saw Stine's posting on Facebook and that she wanted  
28

1 to purchase the Covid vaccine because she needed to go back to work. The following  
2 statements were made during the text communication:

- 3 a. Stine: "I can give you your primary shot today and boost you 2-3 weeks  
4 later. Or I can give you a shot in both shoulders – very tiny needles."
- 5 b. UC: "That's amazing." "My brother is on chemo and has a port. Could  
6 you do it through there for him?"
- 7 c. Stine: "It goes subcutaneously on the shoulder."
- 8 d. UC: "He's in Idaho. You know anyone there that can help him? Or  
9 could you show me how to do it for him when you do mine?"
- 10 e. On April 7, 2020, Stine asked, "Where in Idaho?"
- 11 f. UC: "Wallace."
- 12 g. Stine: "...I can vaccinate him, but I need to know his chemo schedule  
13 and also what his diagnosis is."

14 **F. Additional undercover contact and April 9 meeting**

15 30. On April 9, 2020, HSI SSA Dkane (acting in an UC capacity as Angela)  
16 texted the SUBJECT PHONE NUMBER. During the texted exchange a text from the  
17 SUBJECT PHONE NUMBER stated: "Very quickly remind me again how you came  
18 across my vaccine on FB. Hopefully it wasn't because you are friends of one of the  
19 Nazi's who back then was claiming everyone should wait 18 months for the FDA-  
20 approved vaccine (which is exactly mine as far as target)." At the end of the text  
21 conversation, a text from the SUBJECT PHONE NUMBER included possible payment  
22 options as Venmo, Bitcoin, Cash App and PayPal along with a text message, "These  
23 digital options make it easy for some."

24 31. On April 9, 2020, I (acting in an undercover capacity as Angela) and Seattle  
25 Police Officer Sarah Velling (acting in an undercover capacity as Katie) conducted an  
26 undercover meeting with Stine at the Dick's Burgers located at 111 NE 45th Street  
27 Seattle, WA. Prior to the meeting the undercover officers, received the following text  
28 messages from the SUBJECT PHONE NUMBER: "I'm in line to get food" "White t-

1 shirt that says Seattle” “Now I’m in my car on the opposite side you parked.” The  
2 undercover officers located Stine based on the description he provided via text message.  
3 I also recognized Stine from photographs posted on Facebook.

4 32. During the undercover meeting, which was recorded, John T. Stine  
5 provided the following statements regarding the COVID-19 vaccine:

6 a. “So when I started doing this virus they said how did you get ahold of  
7 Coronavirus to make your vaccine. I said I don’t use the virus. I go to the  
8 computer and I look for the little sequence, I download the sequence, send  
9 it off to have the protein made, it comes back two days later. I vaccinate  
10 myself. So on day twelve I was vaccinated.”

11 b. “I’ve already, I’ve already vaccinated breastfeeding moms.”

12 c. “I gotta get to Houston. Damn that’s a long flight. But I gotta get to  
13 Houston for a group there, I vaccinated seven M.D.’s down there.”

14 33. During the undercover meeting Stine made the following statements  
15 regarding his personalized tumor vaccines:

16 a. “My time my schedule is so fluid that I can’t commit to anything because  
17 things happen. Cancer patients always get top priority.”

18 b. “I just take the patients tumor, we do a few tricks to it to make sure it’s safe  
19 and groovy and then we put it subq. And then I activate with a cream a  
20 topical a topical cream I activate the Langerhan cells and that’s an approved  
21 drug from the FDA. Um, and that thing works like magic. It’s awesome.  
22 And so the Langerhan cells get pissed they eat what’s next to them. They  
23 go to the lymph node they and the Langerhan cell is the fast and the most  
24 awesome prolific antigen presenter we have. They’re the reason why we are  
25 all here today.”

26 c. When asked, “how much is the down payment for her grandma?” Stine  
27 replied, “Well ok so for the tumor vaccines it’s a different story. But here’s  
28 the deal. Alright I basically I have 127 patients where it’s like you look at

1 the scale it been zero zero zero zero zero zero the last eight so I have a  
 2 range of \$200,000 to none to none. And it's a shit load on nones who can't  
 3 pay."

4 d. "I got the Oklahoma the Oklahoma guy the Oklahoma guy says I'll pay you  
 5 \$200,000 to keep my wife alive. She was given a three month sentence and  
 6 I and two years later she's still alive. Her metastatic tumors are gone."

7 34. At the conclusion of the undercover meet, I paid Stine \$800 in cash as a  
 8 down payment for future COVID-19 vaccinations for myself, mother and two additional  
 9 family/friends, in total a down payment of \$200 per person.

10 35. Following the undercover meet, agents conducted surveillance of Stine.  
 11 During the surveillance, at approximately 2:22 p.m., agents followed Stine in his vehicle  
 12 as he traveled to the parking lot of Zahntech located at 15215 NE 90<sup>th</sup> St, Redmond, WA.  
 13 (This address contains multiple units in a building which also includes the SUBJECT  
 14 PREMISES). At approximately 2:53 p.m. agents observed Stine exiting the area.

15 **G. Further undercover contact with STINE**

16 36. On April 23, 2020, Katie and the SUBJECT PHONE NUMBER  
 17 exchanged texts regarding the possibility of meeting in Portland to administer the vaccine  
 18 to Katie's grandma and friends. Katie asked if she should see if Angela could get "her  
 19 people to come up?" Katie received the reply from the SUBJECT PHONE NUMBER:  
 20 "Oh love, that would be fine-happy to go down there as well."

21 37. On April 27, 2020, Katie received the following text message from the  
 22 SUBJECT PHONE NUMBER: "I'm in Tucson killing viruses." The texts continued,  
 23 "MT, ID, TX, NM, UT, AZ.....trying to get home and hit LA, SF, and NV on the way  
 24 back. Just got news that my lovely ovarian cancer patient with stage 4 tumors that her  
 25 tumors are shrinking!!!!!! OMFG! I love personalized tumor vaccines!!!! Someday I'll  
 26 have time to celebrate."

27 38. On April 28, 2020, Katie received the following text messages from the  
 28 SUBJECT PHONE NUMBER:

- 1 a. "I'm home, Wading thru all of my new found publicity. Hahahaha!"
- 2 b. "I'm in the news! Some panty-wastes in Friday Harbor<sup>1</sup> got upset when I
- 3 was going to come up and vaccinate their mayor. It raised a piss load of
- 4 little tattle tails and they cried to their mom and the AG sent me a cease and
- 5 desist order on selling the vaccine. I just simply call it an "immunogen"
- 6 and it takes care of everything. It just so happens that antibodies to my
- 7 immunogen can make one immune which then puts it in the vaccine
- 8 category-but immunogen works for me. : - )"
- 9 c. "No – not any of those in my apt. And my lab is in an undisclosed
- 10 location."
- 11 d. "Don't have any flasks or beakers in my house. I have to be secret. There
- 12 aren't many who would understand a garage lab-people tend to frown on
- 13 that. I on the other hand have made several labs out of garages and they do
- 14 exactly what the big nicer labs do. I lived in my lab before I got this
- 15 awesome apt."

16 39. On or about April 27, 2020, the Washington Attorney General's Office  
 17 (WAGO) issued John T. Stine a "Notice to Cease and Desist" regarding unfair and  
 18 deceptive acts related to COVID-19 pandemic. The letter indicated that the WAGO had  
 19 received information that Stine is selling and administering a COVID-19 "vaccine" and  
 20 that Stine is making false or unsupported claims about this vaccine that may mislead  
 21 consumers. The letter told Stine to "immediately stop making misrepresentations about  
 22 your COVID-19 'vaccine.'" Continuing to do so may result in a lawsuit against you and  
 23 the imposition of civil penalties of up to \$2000 per violation." The WAGO also issues a  
 24 press release about this letter.

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26 <sup>1</sup> On April 21, 2020, the FDA received an emailed complaint regarding Stine. The complaint stated, in part: "I'm  
 27 part of a local Facebook group for Friday Harbor, WA and it has been publicly announced there that a friend of the  
 28 town mayor's is selling a "vaccine" for COVID-19 for \$400 / person to 100 lucky people. As such a thing does not  
 exist I believe this should be investigated and the person should be prosecuted. The persons name is Johnny T Stine  
 and his # is 206-605-0100 and website is <http://www.northcoastbio.com/NCB/home.html>. ..."



40. On April 29, 2020, Katie texted the SUBJECT PHONE NUMBER about meeting next week to receive the vaccinations, and how many people he can vaccinate at one time. During the text exchange, Katie received the following text messages from the SUBJECT PHONE NUMBER:

- a. "So you are aware of the fact that the Attourney General sent me a cease and desist letter."
- b. "I have to say it like this: What I have is an immunogen which is the nCoV19 spike protein. Antibodies to the spike protein have been shown to be neutralizing in vitro and in vivo. Once injected, you will raise a polyclonal antibody response to this immunogen. Any antibodies generated that happen to neutralize virus will be purely coincidental and an added bonus. Wednesday would work for me."
- c. "I would like to ask one favor.....given that Portland is out of state, let's just make sure that any transactions that take place further be done here in WA-State-so I don't get busted for going over state lines-this is just to be safe please."
- d. "I mean for payment-It might make a difference and make me compliant if we took care of the financials on this side of the Columbia before me going into Oregon to immunize this group."
- e. "I have to say immunize-not vaccinate. It's just semantics."
- f. "Yes. Unless the Attourney General arrests me before then. They simply said that I can not make claims about a "vaccine". So I just call it an immunogen and that's it."

41. On May 5, 2020, Katie exchanged texts with the SUBJECT PHONE NUMBER regarding the administration of the COVID-19 vaccination to a group of individuals in Portland on May 6, 2020. At that time, the SUBJECT PHONE NUMBER provided information that the meeting would not take place.

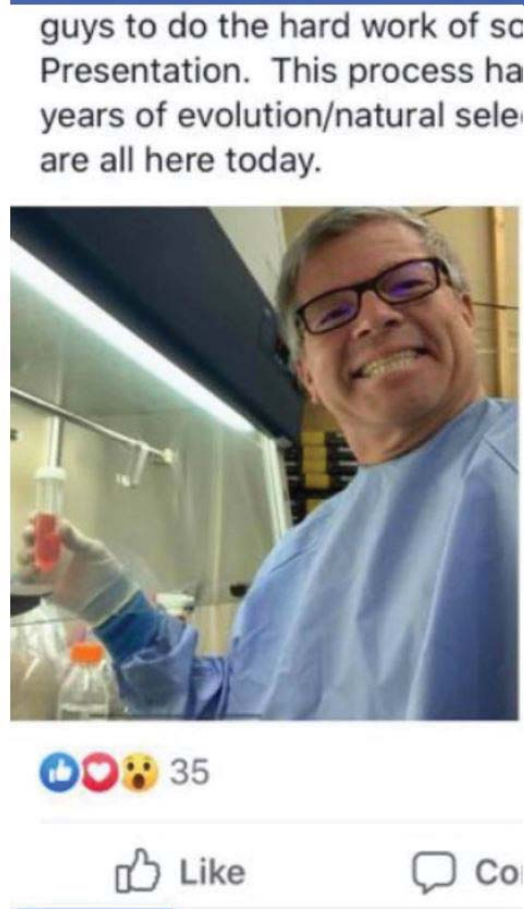
//

**H. Stine's Facebook Contacts**

42. On May 13, 2020, the Honorable Mary Alice Theiler signed a search warrant for Facebook accounts of Johnny T Stine and North Coast Biologics. I reviewed the information provided by Facebook and found that the account of Johnny T Stine contained numerous messages and/or discussions regarding his COVID-19 vaccine, specific individuals he did or planned to vaccinate, information regarding the makeup of his COVID-19 vaccine and Stine's laboratory location (SUBJECT PREMISES). The following are some examples:

- a. On February 18, 2020, Individual-4 contacted the Subject Facebook Account and stated, "saw another Dr JTS breakthrough FB post....really, you developed a coronavirus vaccine in your Redmond garage lab"
- b. The Stine Facebook Account replied, "Yes...it took one day to design, two weeks to make, and will be testing my sera for neutralizing antibodies....which at this point is slam dunk based on vaccine design."
- c. On February 29, 2020, Individual-4 stated, "once you announce all the media will be at your Redmond garage lab and think tank apartment."
- d. The Stine Facebook Account stated: "I don't want media coverage. The first thing they'll do is try to hang me. They'll come to the lab with their reporters and cameras and they'll mock my approach by looking at my choice of lab conditions. I'm so glad I kept the location of my lab secret – I knew this could happen at some point in the future if I was out flipping a middle finger to the system and getting things done. Perhaps it will be something for the book later, but today, I would be persecuted."
- e. Individual-4, replied "and I haven't told anyone about your garage lab or next door think tank apartment"

43. On April 4, 2020, Individual-4 sent the Stine Facebook Account the below photograph (Photograph 1) that appeared to be a prior Facebook post of Stine in his lab location. Following the posting Individual-4 stated the following:



- a. “looks like you broke into the old ICOS Baja lab”
- b. “do you have any lab help there?”
- c. On April 5, 2020, Individual-4 stated, “guess you can go to your lab anytime” “guess you are too busy in your lab making vaccine to msg”
- d. The Subject Facebook Account replied, “I just woke up from another 12 hour slumber! No - no lab help. I would never drag anyone into the cross hairs that I have on me now nor would I ever give up the location

1 of my lab unless I could find someone I trusted completely. My sons  
 2 however, have volunteered to help. They are immune. And yeah – I can  
 3 go to my lab whenever – it’s like the bat cave.”

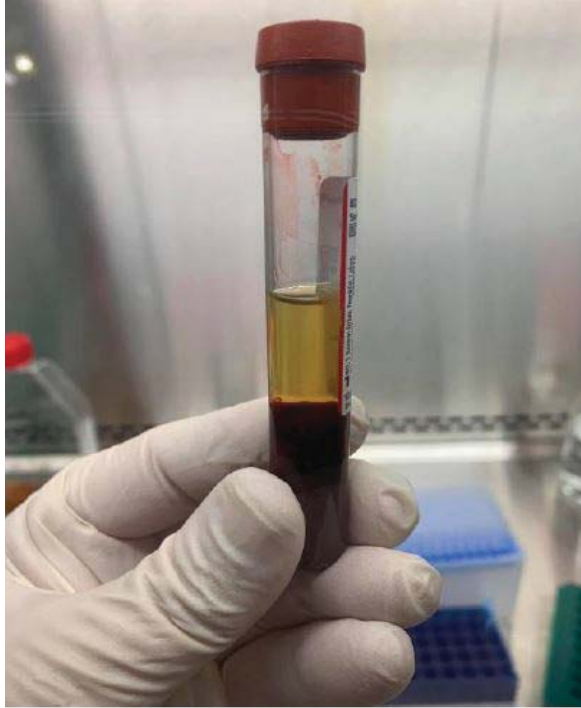
4 44. On March 5, 2020, the Stine Facebook Account sent Individual-5 a  
 5 photograph of his Venmo QR code and Venmo name “@Johnny-Stine” as a payment  
 6 method for Stine’s COVID-19 vaccine. On March 6, 2020, Individual-5 stated:

- 7 a. “I have 7 people and will transfer 2800 to you”
- 8 b. “What’s last 4 numbers of your phone?”
- 9 c. “Having a little problem transferring money with Amex”
- 10 d. “Ok it looks like the money transfer was successful”

11 45. On March 11, 2020, the Stine Facebook Account communicated with  
 12 Individual-5. The conversation went as follows:

- 13 a. “Good morning Dave! I got the text early this morning that has me  
 14 routing my trip to Anchorage instead of Houston. I have a mesothelioma  
 15 patient that has a tumor sample for me and I must pick that up. So I will  
 16 put in a nice little box 7 loaded syringes and you can administer this  
 17 round. ....”
- 18 b. Individual-5 stated, “Sounds good Johnny” and then provided his  
 19 address in Houston, TX, and cell phone number.
- 20 c. The Stine Facebook Account then sent a photograph to Individual-5, of  
 21 a Priority Overnight FedEx label, containing FedEx tracking number  
 22 3910 4525 5640. The package was addressed to Individual-5 in  
 23 Houston, TX. The shipping label listed the return address as Johnny  
 24 Stine, 15219 NE 90<sup>th</sup> St, Redmond, WA 98052 (the SUBJECT  
 25 PREMISES).

26 46. On May 13, 2020, the Subject Facebook Account sent the below  
 27 photograph (Photograph 2) and the following text exchange via Facebook with  
 28 Individual-5:



- a. The Subject Facebook Account stated: “My serum – loaded with anti-spike protein antibodies!!!”
- b. Individual-5 stated, “so awesome dude you are da man in my book !”
- c. The Subject Facebook Account replied, “Hahaha!! I can honestly say that I’m a shitty phlebotomist though!!!!” The Subject Facebook Account then sent the following two photographs, one showing both arms (Photograph 3) and the other showing one arm (Photograph 4).



47. On April 26, 2020, the Stine Facebook Account sent Individual-7 two photographs. The first was of the packaging box for Imiquimod Cream USP, 5%, indicating “Rx Only.” The second photograph included the same Imiquimod 5% Cream, but with a prescription label over the box showing from Costco Wholesale Corporation/Costco Pharmacy. The label indicated that it was prescribed to Johnny Stine. The prescriber listed was Spencer C. Li, and the address 15219 NE 90<sup>th</sup> St., Redmond, WA (the SUBJECT PREMISES) was listed. No other addresses, besides the Costco Pharmacy, in Redmond, WA, address were visible on the prescription label photograph. (Further research conducted found that a Dr. Spencer C. Li is a practicing Physician in Texas. A search of the Washington State Department of Health Provider Credential database did not identify any individuals named Spencer Li).

#### **I. FDA/FTC Letter to Stine**

48. On or about May 21, 2020, the FDA and Federal Trade Commission sent a joint warning letter to Stine that stated based on their review the COVID-19 vaccine that



1 Stine offered for sale in the United States it was found to be an unapproved new drug, a  
2 misbranded product and an unlicensed biological product. The letter stated: “Due to the  
3 serious public health concerns related to the marketing and sale of unapproved drugs for  
4 the mitigation, prevention, treatment, diagnosis, or cure of COVID-19, it is essential that  
5 you do not resume selling your product for prevention of COVID-19.”

6 49. On June 15, 2020, Stine emailed the FDA at the requested address provided  
7 in the letter and replied, “I complied immediately with my state AG’s office as soon as I  
8 received electronically the cease and desist letter. I didn’t know about the letter until  
9 receiving the electronic version via email and I replied back to let them know I was in  
10 compliance. My LinkedIn account which was taken down LONG before the AG’s letter  
11 is still down and as far as I can tell, the FB posts have been removed where I was in  
12 communication only with friends and family. It appears that the LinkedIn data and FB  
13 data was removed promptly after receiving the letter from AG which preceded the FDA  
14 letter. I am a “company” of ONE person which makes it hard to receive mail in a timely  
15 manner. But I did receive the electronic version.

16 I only made material in the microgram quantities and had no intention of doing any of  
17 this as a business as I was asked to help out due to the dead bodies coming out of the  
18 epicenter in Kirkland which is only 5 miles from where I live.

19 Everything has been burned and/or destroyed. The Moderna spike protein vaccine  
20 appears to be on it’s way to being administered late in the year or early next. At the  
21 moment, there are 139 vaccines in development and virtually all of them target the spike  
22 protein. I think in time the masses will be well taken care of.

23  
24 Johnny Stine  
25 Founder & CEO  
26 North Coast Biologics  
27 500 Yale Ave N  
28 Seattle, WA 98109

1 [www.northcoastbio.com](http://www.northcoastbio.com)

2 206-605-0100

3 Sent from NCB iPad”

4 **J. Additional Surveillance**

5 50. On May 18, 2020, AT&T subscriber records were received and listed  
6 Johnny Stine as the subscriber of the SUBJECT PHONE NUMBER with an address of  
7 4025 Stone Way N, Seattle, WA 98103 and billing/credit address of 15219 NE 90th St,  
8 Redmond, WA 98052 (SUBJECT PREMISES).

9 51. On May 29, 2020, the Honorable Mary Alice Theiler signed search warrant  
10 and pen trap for this number requesting prospective cell cite location data.

11 52. On June 1, 2020, agents conducted surveillance of Stine. At approximately  
12 1:32 p.m., SSA Dkane observed Stine using his phone, SSA Dkane exchanged  
13 undercover Facebook messages with Stine (using the same undercover identity from the  
14 April 6, 2020 messages). SSA Dkane (acting in an undercover capacity) continued a text  
15 conversation with Stine about Stine’s plans for the day. At 1:32 p.m., Stine replied to  
16 SSA Dkane’s message inquiring about Stine’s plans for the day as follows:

17 a. UC: “What else is on the agenda? A full spa day for ya today? ☺”

18 b. Stine: “I Wish! I have to do some lab work. And then have a few  
19 People who need some help today and tomorrow with the nCoV19.”

20 53. Following this exchange, agents maintained surveillance of Stine as he  
21 traveled from Issaquah to Sammamish. SSA Dkane stood on a public walking trail and  
22 observed Stine meeting with a Caucasian male while they were standing in the driveway  
23 of this residence. Stine was speaking loudly to this individual and SSA Dkane could hear  
24 Stine say the following words during their conversation: “Proteins,” “Antibodies” and  
25 “I’m just trying to help people.” As the conversation came to end, SSA Dkane overheard  
26 Stine say, “drugs to lab.” After Stine departed this location, he drove to the easternmost  
27 warehouse/garage unit within the Zahntech Automotive Service property at 15215 NE  
28 90th St, Redmond, WA, which is the SUBJECT PREMISES located at 15219 NE 90<sup>th</sup> St,

1 Redmond, WA. (Agents first observed Stine drive through a nearby residential  
2 community on 92nd Street, where they temporarily lost sight of him before observing  
3 him parked at the SUBJECT PREMISES.)

4 54. At approximately 2:50 p.m., HSI SA Scott MacDonald observed Stine exit  
5 the SUBJECT PREMISES and lock it with his keys. HSI SA Tammy Spencer relayed to  
6 SSA Dkane that this was the same unit she had observed Stine enter following his  
7 undercover meeting with SA Zigler and Officer Velling on April 9, 2020. At that time,  
8 SA Spencer also saw Stine access the SUBJECT PREMISES with his keys.

9 55. Stine remained at the SUBJECT PREMISES and agents observed Stine  
10 walk around the property and speak to some unidentified individuals. At approximately  
11 3:46 p.m., SA Spencer observed Stine use keys to unlock the door and reenter the  
12 SUBJECT PREMISES. At 3:53 p.m., SA MacDonald observed Stine depart the  
13 SUBJECT PREMISES, again using his keys to lock the door. SA MacDonald observed  
14 that Stine was holding a red pouch/folder. HSI SAs Matt Eiding and MacDonald then  
15 observed Stine access the rear of his vehicle and depart.

16 56. Agents then followed Stine as he drove directly to apartments located in  
17 Redmond, WA. Here, at 3:58 p.m., HSI SA Abigail Sawyer observed Stine park and  
18 walk into the access-controlled area for residents inside of the parking garage.

19 57. On June 2, 2020, agents conducted surveillance of Johnny Stine.  
20 Surveillance units followed Stine to Costco, located at 7725 188<sup>th</sup> Ave NE, Redmond,  
21 WA. Here, SSA Dkane observed Stine park and enter the Costco. SA Eiding also  
22 entered the Costco and located Stine within the store. SA Eiding followed Stine within  
23 the Costco and could hear him talking loudly on his cell phone. SA Eiding observed  
24 him at the outdoor recreation area talking about picking up an item at the pharmacy. SA  
25 Eiding then heard Stine say the word "serum." SA Eiding observed Stine pick up a  
26 prescription at the pharmacy, pay for it, and depart the store. Agents followed Stine as he  
27 then drove to the SUBJECT PREMISES, where Stine remained for less than 10 minutes.  
28

58. After Stine left the SUBJECT PREMISES, SA Zigler and SSA Dkane walked to the front porch/entry area of the SUBJECT PREMISES. Agents observed that the front of the unit was a glass “waiting area” separate from the back of the unit by a closed brown door. Through the uncovered windows, agents observed items in the waiting area. SSA Dkane observed a large standup paddle board marked with the letters, “NSP.” SSA Dkane recognized this paddleboard (with the same markings) from a photograph that Stine had sent to SSA Dkane’s undercover Facebook identity on May 11, 2020. In this photograph, Stine is shirtless holding the paddle board. SA Zigler and SSA Dkane then walked to the rear of the unit and observed a transom window over the rear door. The lights were on and condensation had collected along the window. Outside of the rear door, agents observed plastic tubs with liquid and gloves.

59. Agents later placed a surveillance camera in an adjacent parking lot and departed. SSA Dkane later reviewed the footage from this camera, along with data SA Zigler obtained from the court-authorized GPS tracking data. Based on this information, and paired with the physical observations of Stine, agents determined that he made three more visits to the SUBJECT PREMISES on June 2, 2020.

60. On June 15, 2020, SSA Dkane conducted surveillance of the SUBJECT PREMISES. SSA Dkane observed Stine at the SUBJECT PREMISES at approximately 1:00 p.m. and leaving the SUBJECT PREMISES at approximately 2:14 p.m. SSA Dkane observed Stine return to the SUBJECT PREMISES at approximately 2:28 p.m. and unlock the SUBJECT PREMISES door, return to his car, open the car’s rear lift gate and remove what appeared to be a cylindrical object, which Stine took it into the SUBJECT PREMISES. SSA Dkane observed Stine leave the SUBJECT PREMISES at approximately 6:10 p.m. During the time that HSI SSA Dkane observed the SUBJECT PREMISES, HSI SSA Dkane did not see any moving trucks/vehicles, additional people other than Stine and/or any removal of equipment from the SUBJECT PREMISES. Despite Stine’s June 15th email to the FDA, agents did not observe evidence that Stine burned or destroyed any records from the premises.

61. During these surveillances, the court-authorized GPS tracking data from Stine's cell phone was corroborated by the physical surveillance conducted. Based on this information an HSI Criminal Analyst was able to determine the approximate GPS tracking location data of the SUBJECT PREMISES. The following days show a continued pattern of the cellular phone (and likely Stine) at the SUBJECT PREMISES:

- a. Saturday, 05/30/2020
- b. Monday, 06/01/2020
- c. Tuesday, 06/02/2020
- d. Wednesday, 06/03/2020
- e. Tuesday, 06/09/2020
- f. Wednesday, 06/10/2020
- g. Thursday, 06/11/2020
- h. Friday, 06/12/2020
- i. Monday 06/15/2020
- j. Friday, 6/26/2020
- k. Saturday, 6/27/2020
- l. Sunday, 6/28/2020
- m. Monday, 6/29/2020
- n. Thursday 7/2/2020
- o. Friday, 7/3/2020
- p. Monday, 7/6/2020
- q. Tuesday, 7/7/2020

**K. WAGO Consent Decree**

62. On or about June 22, 2020, the WAGO filed a Consent Decree, signed by the WAGO and Stine, that indicated that Stine was to refrain from marketing, advertising, promoting, or selling vaccines, immunogens, antibodies, or any other substance or product that Stine or his company represents to have health benefits unless Stine has sufficient scientific evidence to substantiate each claim or unless the subject or product is

1 first subjected to safety and efficacy testing. Stine also agreed to pay State of  
 2 Washington \$38,500; however \$30,000 of these funds will be suspended if Stine is in  
 3 compliance with the Consent Decree.

4 63. Under the Consent Decree, Stine agreed to provide information on all  
 5 consumers whom the COVID-19 vaccine was provided or administered, and provided  
 6 refunds if requested. Stine was not required by the Consent Decree to produce the names  
 7 of the tumor vaccine customers.

8 64. On August 6, 2020, I received a copy of the list Stine provided to the  
 9 WAGO in response to the Consent Decree. The list contained approximately 51 names  
 10 (some only first names) and ten corresponding phone numbers. Based on past  
 11 communications and a review of Stine's Facebook statements this number appears to be  
 12 much less than previously indicated by Stine.

13 65. Further, as indicated by the tracking data above, Stine visited the  
 14 SUBJECT PREMISES multiple times after he entered into the Consent Decree.

15 **L. Additional Information**

16 66. On July 16, 2020, the Honorable Brian A. Tsuchida signed a search  
 17 warrant for Facebook contents related to the accounts of Johnny T Stine and North Coast  
 18 Biologics regarding tumor vaccines. I reviewed the information provided by Facebook  
 19 and found that the account of Johnny T Stine contained numerous messages and/or  
 20 discussions regarding his tumor vaccines during the time period of 2018 and 2019. For  
 21 example, Stine indicated that he had a trip planned to Australia for a glioblastoma patient  
 22 (posted in 2018), that he was providing a personalized tumor vaccine to a woman in  
 23 Montana (posted in 2018), that he cured a stage 4 ovarian cancer patient (posted in 2018),  
 24 and treated an individual with colorectal cancer (posted in 2019).

25 **M. Further August 2020 investigation of SUBJECT PREMISES and Idaho**  
 26 **UC Meeting**

27 67. On August 10, 2020, SA Zigler and HSI SSA Dkane went to the  
 28 SUBJECT PREMISES. Agents observed Stine at the SUBJECT PREMISES. The



1 SUBJECT VEHICLE, with two surf boards on top of it, was parked in front of the  
 2 SUBJECT PREMISES. Stine was observed moving items into an open garage bay,  
 3 which was the second garage to the right of the SUBJECT PREMISES entry door. SA  
 4 Zigler and SSA Dkane observed Stine moving what appeared to be an industrial shelving  
 5 unit into the open bay. SA Zigler also observed Stine move a surf board into the open  
 6 bay. SSA Dkane then drove into the parking area in front of the SUBJECT PREMISES  
 7 and was able to see into the open bay and that the open bay was connected to the bay  
 8 directly to its left (this garage/bay door was closed). SSA Dkane observed a large  
 9 opening that connected the two bays and what appeared to be several industrial sized  
 10 refrigerators on the connecting wall between the two bays. SSA Dkane also believed that  
 11 one of the refrigerators appeared to be on because it was lit up.

12 68. On Monday, August 10, 2020, HSI SSA Dkane (in the same undercover  
 13 capacity as on April 6, 2020) sent a message to STINE via Facebook Messenger. STINE  
 14 indicated that he was going to be in Wallace, Idaho, in the next week, and wanted to meet  
 15 up with the undercover. During the message exchange the following statements were  
 16 made (among others, the entire exchange is not included here):

- 17 a. Stine: "I'm likely to be in Wallace Tuesday night! ... I was thinking  
 18 that I'd get a room at the Stardust either tomorrow night or Wed. Night.  
 19 And then you can come see me."... "Getting shit done ... makes me  
 20 want to take drugs and escape! Crack and meth will make anything  
 21 better!!!! Hahaha! ... Meth was fun – made me horny for days!  
 22 OMG!"
- 23 b. UC: "That's why I was asking how long you had to spend in Wallace  
 24 lol."
- 25 c. Stine: "Oh if you get me high ..... I'll stay as long as you keep me high  
 26 ... but hourly rates make it hugely expensive."
- 27 d. UC: "I thought we we're not exchanging anything ... just a couple of  
 28 friends helping friends remember?"

- e. Stine: “And you would still get me high?”
- f. UC: “I hate to break it to you but meth isn’t exactly hard to come by in my profession.”
- g. Stine: “Well – get me addicted to it so I’ll have to become your regular!!!!”
- h. UC: “I haven’t been working because of the whole covid thing. Remember?”
- i. Stine: “Then you can have me – I’m immune!”
- j. UC: “Immune huh? Nice” “Normally I wouldn’t care too much, but I think I told you I take care of my brother some times so im paranoid about getting him sick”
- k. Stine: “I will immunize you with the neutralizing epitopes on the spike protein of this virus. It fucking works! I have a high antibody titer to it and I’ve been in four quarantine rooms with deathly ill people without a mask and I’ve never even gotten a sniffle.”
- l. UC: “Seriously?”
- m. Stine: “YES! I even saved a guy’s life!!!! That was fucking emotinal for me. Emotional. ...”
- n. Stine: “I think we should Tuesday next week .... that way if you get me really fucked up, I can afford to burn the next 4 or 5 days. I deserve some looooooog meth time.”
- o. UC: “Well the fun is in the wait. Want to touch base tomorrow? Firm up some plans?”

69. On August 11, 2020, in further Facebook messenger conversation, Stine confirmed that he would meet the undercover in Wallace, Idaho, on Thursday, August 20, 2020, and that he would provide the undercover the so-called Covid vaccine and Stine would use methamphetamine. Excerpts from the conversation:

- a. Stine: "I hear that stuff can be injected? Maybe you can do that to me too. I've never tried – I'm still a newbie. Hahaha!"
- b. UC: "Wait so are we injecting each other then lol? Cause didn't you say that your stuff is an injection?"
- c. Stine: "Yes – it can be – intranasal also."
- d. UC: "You for sure about this?" [STINE responded "Omg yes!" and then the UC sent a picture of drug paraphernalia.]
- e. UC: "How many injections of your stuff do I need to do?"
- f. Stine: "Well I could give you two to start and then another 3 weeks later."
- g. UC: "If you're serious I'll get everything together. My friend has an air b n b I could try to get."
- h. Stine: "OK – let's plan on me arriving next Thursday – and we'll do Th night – however long you let me off the drug. :-). Yuuuuummmmy!"

70. On Wednesday, August 12, 2020, Stine wrote the undercover that he was "on the road to Spokane and then to whitefish so I'm just driving right now." Later that day, Stine sent a picture of the Oasis Bordello Museum, in Wallace, Idaho, to the UC.

### **COMPUTERS, ELECTRONIC STORAGE, AND FORENSIC ANALYSIS**

71. Based on my training and experience and factual background above, I believe that Stine maintains at least some of the items sought by this affidavit in electronic devices. For example, I know based on information from my undercover contacts with him that Stine corresponds with individuals through text message. Also, the "Johnny T Stine" Facebook post, dated March 2, 2020, asked individuals to either "message me here or by text 206-605-0100" regarding the COVID-19 vaccine, indicating he may use computer/laptop and/or phone to log into Facebook.

72. As described above and in Attachment B, this application seeks permission to search for records that might be found in the SUBJECT PREMISES, in

1 whatever form they are found. One form in which the records will likely be found is data  
2 stored on a computer's hard drive, on other storage media, or other digital devices,  
3 including cell phones (hereinafter collectively referred to as digital devices). Thus, the  
4 warrant applied for would authorize the seizure of electronic storage media or the  
5 copying of electronically stored information, all under Rule 41(e)(2)(B).

6 73. There is probable cause to believe that records will be stored on a digital  
7 device because, based on my knowledge, training, and experience, I know:

8 a. Computer files or remnants of such files can be recovered months or even  
9 years after they have been downloaded onto a digital device, deleted, or viewed via the  
10 Internet. Electronic files downloaded to a digital device can be stored for years at little or  
11 no cost. Even when files have been deleted, they can be recovered months or years later  
12 using forensic tools. When a person "deletes" a file on a digital device, the data  
13 contained in the file does not actually disappear; rather, that data remains on the digital  
14 device until it is overwritten by new data. Therefore, deleted files or remnants of deleted  
15 files, may reside in free space or slack space—that is, in space on the digital device that is  
16 not currently being used by an active file—for long periods of time before they are  
17 overwritten. In addition, a digital device's operating system may also keep a record of  
18 deleted data in a "swap" or "recovery" file.

19 b. Wholly apart from user-generated files, digital devices—in particular,  
20 internal hard drives—contain electronic evidence of how a digital device has been used,  
21 what it has been used for, and who has used it. To give a few examples, this forensic  
22 evidence can take the form of operating system configurations, artifacts from operating  
23 system or application operation, file system data structures, and virtual memory "swap"  
24 or paging files. Digital device users typically do not erase or delete this evidence,  
25 because special software is typically required for that task. However, it is technically  
26 possible to delete this information.

27 c. Similarly, files that have been viewed via the Internet are sometimes  
28 automatically downloaded into a temporary Internet directory or "cache."

1           74. As further described in Attachment B, this application seeks permission to  
2 locate not only computer files that might serve as direct evidence of the crimes described  
3 on the warrant but also for forensic electronic evidence that establishes how digital  
4 devices were used, the purpose of their use, who used them, and when. There is probable  
5 cause to believe that this forensic electronic evidence will be on any digital device in the  
6 SUBJECT PREMISES, because, based on my knowledge, training, and experience, I  
7 know:

8           a. Data on the digital device can provide evidence of a file that was once on  
9 the digital device but has since been deleted or edited, or of a deleted portion of a file  
10 (such as a paragraph that has been deleted from a word processing file). Virtual memory  
11 paging systems can leave traces of information on the storage medium that show what  
12 tasks and processes were recently active. Web browsers, email programs, and chat  
13 programs store configuration information on the digital device that can reveal  
14 information such as online nicknames and passwords. Operating systems can record  
15 additional information, such as the attachment of peripherals, the attachment of USB  
16 flash storage devices or other external storage media, and the times the digital device was  
17 in use. Computer file systems can record information about the dates files were created  
18 and the sequence in which they were created.

19           b. Forensic evidence on a digital device can also indicate who has used or  
20 controlled it. This “user attribution” evidence is analogous to the search for “indicia of  
21 occupancy” while executing a search warrant at a residence. For example, registry  
22 information, configuration files, user profiles, email, email address books, “chat,” instant  
23 messaging logs, photographs, the presence or absence of malware, and correspondence  
24 (and the data associated with the foregoing, such as file creation and last-accessed dates)  
25 may be evidence of who used or controlled the digital device at a relevant time. Further,  
26 forensic evidence on a digital device can show how and when it was accessed or used.  
27 Such “timeline” information allows the forensic analyst and investigators to understand  
28 the chronological context of access to the digital device, its use, and events relating to the

1 offense under investigation. This “timeline” information may tend to either inculcate or  
2 exculpate the user of the digital device. Last, forensic evidence on a digital device may  
3 provide relevant insight into the user’s state of mind as it relates to the offense under  
4 investigation. For example, information on a digital device may indicate the user’s  
5 motive and intent to commit a crime (e.g., relevant web searches occurring before a crime  
6 indicating a plan to commit the same), consciousness of guilt (e.g., running a “wiping  
7 program” to destroy evidence on the digital device or password protecting or encrypting  
8 such evidence in an effort to conceal it from law enforcement), or knowledge that certain  
9 information is stored on a digital device (e.g., logs indicating that the incriminating  
10 information was accessed with a particular program).

11 c. A person with appropriate familiarity with how a digital device works can,  
12 after examining this forensic evidence in its proper context, draw conclusions about how  
13 digital devices were used, the purpose of their use, who used them, and when.

14 d. The process of identifying the exact files, blocks, registry entries, logs, or  
15 other forms of forensic evidence on a digital device that are necessary to draw an  
16 accurate conclusion is a dynamic process. While it is possible to specify in advance the  
17 records to be sought, electronic evidence is not always data that can be merely reviewed  
18 by a review team and passed along to investigators. Whether data stored on a digital  
19 device is evidence may depend on other information stored on the digital device and the  
20 application of knowledge about how a digital device behaves. Therefore, contextual  
21 information necessary to understand other evidence also falls within the scope of the  
22 warrant.

23 e. Further, in finding evidence of how a digital device was used, the purpose  
24 of its use, who used it, and when, sometimes it is necessary to establish that a particular  
25 thing is not present on a digital device. For example, the presence or absence of counter-  
26 forensic programs or anti-virus programs (and associated data) may be relevant to  
27 establishing the user’s intent.  
28



1           75. In most cases, a thorough search for information that might be stored on a  
2 digital device often requires the seizure of the device and a later, off-site review  
3 consistent with the warrant. In lieu of removing a digital device from the SUBJECT  
4 PREMISES, it is sometimes possible to image or copy it. Generally speaking, imaging is  
5 the taking of a complete electronic picture of the digital device's data, including all  
6 hidden sectors and deleted files. Either seizure or imaging is often necessary to ensure  
7 the accuracy and completeness of data recorded on the digital device and to prevent the  
8 loss of the data either from accidental or intentional destruction. This is true because:

9           a. As noted above, not all evidence takes the form of documents and files that  
10 can be easily viewed on site. Analyzing evidence of how a digital device has been used,  
11 what it has been used for, and who has used it requires considerable time, and taking that  
12 much time on premises could be unreasonable. As explained above, because the warrant  
13 calls for forensic electronic evidence, it is exceedingly likely that it will be necessary to  
14 thoroughly examine digital devices to obtain evidence. Digital devices can store a large  
15 volume of information. Reviewing that information for things described in the warrant  
16 can take weeks or months, depending on the volume of data stored, and would be  
17 impractical and invasive to attempt on-site.

18           b. Records sought under this warrant could be stored in a variety of formats  
19 that may require off-site reviewing with specialized forensic tools. Similarly, digital  
20 devices can be configured in several different ways, featuring a variety of different  
21 operating systems, application software, and configurations. Therefore, searching them  
22 sometimes requires tools or knowledge that might not be present on the search site. The  
23 vast array of hardware and software available makes it difficult to know before a search  
24 what tools or knowledge will be required to analyze the system and its data on the  
25 premises. However, taking the digital device off-site and reviewing it in a controlled  
26 environment will allow its examination with the proper tools and knowledge.

27           76. *Nature of the examination.* Based on the foregoing, and consistent with  
28 Rule 41(e)(2)(B), the warrant for which I apply would permit seizing, imaging, or

1 otherwise copying digital devices that reasonably appear to contain some or all of the  
2 evidence described in the warrant and would authorize a later review of the device or  
3 information consistent with the warrant. The later review may require techniques,  
4 including but not limited to computer-assisted scans of the entire device, that might  
5 expose many parts of a hard drive to human inspection in order to determine whether it is  
6 evidence described by the warrant.

7 77. If, at the conclusion of the examination, law enforcement personnel  
8 determine that particular files or file folders on the digital device do not contain any data  
9 falling within the scope of the warrant, they will not search or examine those files or  
10 folders further without authorization from the Court. Law enforcement personnel may  
11 continue to examine files or data falling within the purview of the warrant, as well as data  
12 within the operating system, file system, software application, etc., relating to files or  
13 data that fall within the scope of the warrant, through the conclusion of the case.

14 78. If an examination is conducted, and the digital device does not contain any  
15 data falling within the ambit of the warrant, the government will return the digital device  
16 to its owner within a reasonable period of time following the search and will seal any  
17 image of the digital device, absent further authorization from the Court.


18 79. The government may retain the digital device as evidence, fruits,  
19 contraband, or an instrumentality of a crime or to commence forfeiture proceedings  
20 against the digital device and/or the data contained therein.

21 80. The government will retain a forensic image of the digital device for a  
22 number of reasons, including proving the authenticity of evidence to be used at trial,  
23 responding to questions regarding the corruption of data, establishing the chain of  
24 custody of data, refuting claims of fabricating, tampering, or destroying data, and  
25 addressing potential exculpatory evidence claims where, for example, a defendant claims  
26 that the government avoided its obligations by destroying data or returning it to a third  
27 party.

28 //

Conclusion

82. Based upon the above, there is probable cause to believe that evidence, fruits and/or instrumentalities of the crimes of introduction, in interstate commerce, of misbranded drugs, in violation of 21 U.S.C. § 331(a), are located at the SUBJECT PREMISES as more fully described in Attachment A to this Affidavit, as well as on and in any digital devices or other electronic storage media found at these locations and I therefore request that the court issue a warrant authorizing a search of the SUBJECT PREMISES as well as any digital devices and electronic storage media located therein, for the items more fully described in Attachment B hereto, incorporated herein by reference, and the seizure of any such items found therein.

  
 Angela Zigler  
 Special Agent, FDA-OCI

The above-named agent provided a sworn statement to the truth of the foregoing affidavit by telephone on 19th day of August, 2020.

  
 HONORABLE MARY ALICE THEILER  
 United States Magistrate Judge

**ATTACHMENT A**  
**LOCATION TO BE SEARCHED**

The location to be searched is an industrial property located at 15219 NE 90<sup>th</sup> Street, Redmond, WA 98052, further described as an industrial warehouse with two attached roll-up doors. The property is located in the furthest warehouse/garage unit from the street within the Zahntech Automotive Service complex. There is only one vehicle entry point to this complex, which is off of 152<sup>nd</sup> Ave NE. The entry waiting area and warehouse/garage unit, further identified by the below photographs.





**ATTACHMENT B****ITEMS TO BE SEIZED**

All records, information, and other evidence relating to violation of 21 U.S.C. § 331(a), which involve John T Stine (aka Johnny Stine) and/or North Coast Biologics after January 1, 2018, including:

1. Supplies, including raw materials, used to manufacture, label, and/or package the “COVID-19 vaccine,” “tumor vaccines,” cancer treatments, or other treatment products;
2. Powders, pills, tablets, capsules, creams, syringes, vials, or other containers of any kind, that resemble or appear to be or contain prescription drugs, including but not limited to those containing Imiquimod, Aldara; any drugs with similar properties, that appear to be related to or used with the “COVID-19 vaccine,” “tumor vaccines,” cancer treatments, or other treatment products;
3. Labels, inserts, boxes, bottles, bottle caps, external packaging, blister packs, and other packaging materials related to the “COVID-19 vaccine,” “tumor vaccines” cancer treatments, or other treatment products;
4. Records related to the soliciting, ordering, shipment, importation, exportation, purchase, manufacture, sale, distribution, or storage of drugs, including but not limited to U.S. Customs entry forms; FDA and/or Customs detention, refusal and/or seizure notices; Entry Summaries; U.S. Customs Manifests of Goods; U.S. Customs declaration forms; invoices; bills of lading; air way bills; purchase orders; general ledgers; subsidiary ledgers; packing slips; and air bills;
5. Records, letters and responses to or from the FDA, FTC, U.S. Customs, Washington Attorney Generals Office or any other agencies regarding the COVID vaccine, tumor vaccines, other treatment products or components thereof;

- 1 6. Indicia of ownership, residency, or occupancy of premises including but not  
2 limited to utility bills, telephone bills, loan payment receipts, rent receipts,  
3 trust deeds, lease or rental agreements, escrow documents, canceled  
4 envelopes, and bank account records;
- 5 7. Financial accounts records, payments, purchase orders, sale invoices,  
6 contracts, agreements, complaints, transactional information, or account  
7 ownership information relating to the accounts of John Stine (aka Johnny  
8 Stine) or North Coast Biologics;
- 9 8. Currency, checks, money orders, and any electronic forms of payment  
10 conducted through applications such as Venmo, Zelle, Bitcoin, Paypal and  
11 Cash App;
- 12 9. Any memoranda, records, or correspondence which reference the  
13 movement of currency, payment ledgers, payment receipts or  
14 memorandums documenting cash, wire, check, direct deposit, or any other  
15 form of payment either domestic or international;
- 16 10. Information pertaining to individuals or business that prescribed, ordered,  
17 manufactured, compounded, sold, or shipped, any components of the  
18 "COVID vaccine," "tumor vaccines," cancer treatments, or other treatment  
19 products;
- 20 11. Customers or "patients" lists and their corresponding contact information  
21 relating to those individuals that asked about a vaccine, received and/or  
22 paid for a vaccine, planned to receive a vaccine, received any type of  
23 information or shipment of the "COVID-19 vaccine," a "tumor vaccine" or  
24 cancer treatment including active pharmaceutical ingredients, drug  
25 components, topical creams, that resemble or appear to be or to contain  
26 misbranded drugs;
- 27 12. Travel documents, including flight plans, flight tickets, hotels, receipts;  
28



- 1 13. Cellular telephones and other communication devices including Blackberry,
- 2 Android, Galaxy, iPhone, iPad, and similar devices (collectively
- 3 “SUBJECT DEVICES”);
- 4 14. All records on the SUBJECT DEVICES that relate to violations of Title 21,
- 5 U.S.C. § 331 and involve JOHN T. STINE since January 1, 2018,
- 6 including:
- 7 a. lists of customers, related identifying information and communications
- 8 and/or text conversations regarding any vaccines or treatments;
- 9 b. all sales of drugs/vaccines, including types, amounts, and prices of
- 10 drugs/vaccines as well as dates, places, shipments, and amounts of
- 11 specific transactions and injections;
- 12 c. any information related to sources of drugs/vaccines and drug
- 13 components (including names, addresses, phone numbers, or any other
- 14 identifying information);
- 15 d. any information recording JOHN T. STINE’s schedule or travel from
- 16 January 1, 2018, to the present;
- 17 e. all bank records, checks, credit card bills, account information, and
- 18 other financial records.
- 19 f. Evidence of user attribution showing who used or owned the SUBJECT
- 20 DEVICE[S] at the time the things described in this warrant were
- 21 created, edited, or deleted, such as logs, phonebooks, saved usernames
- 22 and passwords, documents, and browsing history;
- 23 g. Records evidencing the use of the SUBJECT DEVICE to communicate
- 24 with Facebook mail servers, including:
- 25 i. records of Internet Protocol addresses used;
- 26 ii. records of Internet activity, including firewall logs, caches,
- 27 browser history and cookies, “bookmarked” or “favorite” web pages, search terms that
- 28 the user entered into any Internet search engine, and records of user-typed web addresses.
- As used above, the terms “records” and “information” includes all forms of
- creation or storage, including any form of computer or electronic storage (such as hard

1 disks or other media that can store data); any handmade form (such as writing); any  
2 mechanical form (such as printing or typing); and any photographic form (such as  
3 microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, or  
4 photocopies).

5 The term “storage medium” includes any physical object upon which computer  
6 data can be recorded. Examples include hard disks, RAM, floppy disks, flash memory,  
7 CD-ROMs, and other magnetic or optical media.